

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

MISLAV BASIC, NATHAN GRUBER,  
OREN GRUBER, KEVIN BOUDREAU,  
DANIEL SCHWAIBOLD, ALEX  
THOMAS, GREGORY THOMAS, and  
BENJAMIN AYERS, on behalf of  
themselves and all others similarly situated,

*Plaintiffs,*

v.

BPROTOCOL FOUNDATION, GALIA  
BENARTZI, GUY BENARTZI, EYAL  
HERTZOG, YEHUDA LEVI, and BANCOR  
DAO,

*Defendants.*

Case No: 1:23-cv-00533-RP

**[PROPOSED] ORDER GRANTING AGREED MOTION TO EXTEND DEADLINE TO  
RESPOND TO THE COMPLAINT AND TO MODIFY CERTAIN RELATED  
DEADLINES**

The Court has considered the Agreed Motion to Extend Deadline to Respond to the Complaint and to Modify Certain Related Deadlines (the “Motion”) filed on June 30, 2023 by Defendants Guy Ben-Artzi, Galia Ben-Artzi and Eyal Hertzog (the “Moving Defendants”) on behalf of themselves and Plaintiffs (together with the Moving Defendants, the “Initial Parties”). The Court hereby GRANTS the Motion and ORDERS as follows:

1. No Moving Defendant is required to respond to the complaint previously filed in this action (ECF No. 1).
2. Within 75 days after entry of this Court’s order appointing a Lead Plaintiff in this action and approving lead counsel, the Lead Plaintiff shall either identify an operative complaint or file an amended complaint which will become the operative complaint.

3. Within 75 days after the date on which the Lead Plaintiff identifies the operative complaint or files an amended complaint, Moving Defendants shall answer, move against or otherwise respond to the operative complaint.

4. Lead Plaintiff shall file any opposition to any motion to dismiss filed by any Defendant within 45 days after the filing of that motion, and Defendants shall file any reply within 30 days after the filing of Lead Plaintiff's opposition.

5. The initial pre-trial conference in this action, although not yet scheduled, is adjourned *sine die* until Moving Defendants have answered the operative complaint in this action or their motion(s) to dismiss have been decided.

6. Moving Defendants have expressly waived and forfeited all claims, objections and arguments related to service of the summons and complaint in this action upon themselves, the date of such service, and the form of the summons.

7. If any party who is not an Initial Party later appears in this Action, that party may, at their option, elect to be bound by the terms of this Order, and will be subject to its provisions as if they were an Initial Party, including the schedule set forth herein and, as to themselves, the waiver set forth in Paragraph 6.

SO ORDERED, this \_\_\_\_ day of \_\_\_\_\_, 2023.

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HON. ROBERT PITMAN  
UNITED STATES DISTRICT JUDGE